# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

STEPHEN McCOLLUM, et al.,	§	
Plaintiffs,	§	
	§	
<b>v.</b>	§	CIVIL ACTION NO. 4:14-ev-03253
	§	
BRAD LIVINGSTON, et al.,	§	
Defendants.	§	

# THE UNIVERSITY OF TEXAS MEDICAL BRANCH'S UNOPPOSED MOTION FOR LEAVE TO FILE ITS MOTION FOR SUMMARY JUDGMENT WITH BRIEF IN SUPPORT IN EXCESS OF 25 PAGES

The University of Texas Medical Branch at Galveston ("UTMB") files this Unopposed Motion for Leave to File Its Motion for Summary Judgment with Brief in Support in Excess of 25 Pages.

UTMB respectfully moves for an order granting leave to file its Motion for Summary Judgment with Brief in Support in excess of the Court's twenty-five (25) page limit.

Respectfully submitted,

# **KEN PAXTON**

Attorney General of Texas

## **JEFFREY C. MATEER**

First Assistant Attorney General

## **BRANTLEY STARR**

Deputy First Assistant Attorney General

# JAMES E. DAVIS

Deputy Attorney General for Civil Litigation

# KAREN D. MATLOCK

**Assistant Attorney General** 

Chief, Law Enforcement Defense Division

# /s/ J. Lee Haney

## J. LEE HANEY

Attorney-in-Charge
Assistant Attorney General
Texas Bar No. 00784203
Federal I.D. No. 18544
Lee.haney@texasattorneygeneral.gov

#### **HEATHER RHEA**

Assistant Attorney General Texas Bar No. 24085420 Federal I.D. No. 2399979

## SHANNA ELIZABETH MOLINARE

Assistant Attorney General Texas Bar No. 24041506 Federal I.D. No. 38632

#### JENNIFER DANIEL

Assistant Attorney General Texas Bar No. 24090063 Federal I.D. No. 2451063

P.O. Box 12548, Capitol Station Austin, Texas 78711 (512) 463-2080 (512) 936-2109 (Fax)

#### FERNELIUS ALVAREZ SIMON PLLC

#### GRAIG J. ALVAREZ

State Bar No. 24001647 Federal I.D. No. 22596

#### STEPHEN M. FERNELIUS

State Bar No. 06934340 Federal I.D. No. 14121

#### KARA STAUFFER PHILBIN

State Bar No. 24056373 Federal I.D. No. 685342

1221 McKinney Street, Suite 3200 Houston, Texas 77010 (713) 654-1200 (713) 654-4039 (Fax) ATTORNEYS FOR DEFENDANT, UNIVERSITY OF TEXAS MEDICAL BRANCH AT GALVESTON

# **CERTIFICATE OF CONFERENCE**

I, J. LEE HANEY, Assistant Attorney General of Texas, have conferred with opposing counsel, Jeff Edwards, by e-mail on June 10, 2016, and opposing counsel is not opposed to this motion.

/s/ J. Lee Haney
J. LEE HANEY
Assistant Attorney General

# **NOTICE OF ELECTRONIC FILING**

I, J. LEE HANEY, Assistant Attorney General of Texas, certify that I have electronically submitted for filing The University of Texas Medical Branch's Unopposed Motion for Leave to File Its Motion for Summary Judgment with Brief in Support in Excess of 25 Pages, on June 17, 2016, in the Southern District of Texas, Houston Division.

/s/ J. Lee Haney
J. LEE HANEY
Assistant Attorney General

**CERTIFICATE OF SERVICE** 

I, J. LEE HANEY, Assistant Attorney General of Texas, do hereby certify that a true and

correct copy of the above and foregoing has been served on all counsel of record via electronic

mail on June 17, 2016, as authorized by Fed. R. Civ. P. 5(b)(2) and in accordance with the

electronic case filing procedures of the United States District Court for the Southern District of

Texas.

/s/ J. Lee Haney

J. LEE HANEY

Assistant Attorney General

4